REMARKS

Applicants thank the Examiner for the careful consideration of the subject application. The Office Action mailed July 24, 2008 has been carefully considered. In this Office Action, Claims 1-6, 20-33, 42, 44, 45, 62, 64-72, 73, 88-93, 107-118, 127, 129-130, 147-151, 152, 167-177, 285, 187, 188, 205-206, 223, 224, 233, 236, 238-241, 255-268, 276, 277, 279, 280, 297-301, and 303-319 are pending and are rejected. Claims 7-19, 34-41, 43, 46-61, 63, 72, 72a, 74-86, 94-106, 119-126, 128, 131-146, 150, 151, 153-164, 178-184, 186, 189-204, 210-222, 225-232, 234, 235, 237, 424-254, 269-275, 278, 281-296, and 302 have been previously cancelled without prejudice. Claims 1, 62, 88, 147, 205, and 236 have been amended with the filing of this response and no new matter has been added and the amendments are supported by, at least, page 22 lines 23-27 and page 18 lines 13-17.

Claims 1-5, 20-33, 44-45, 62, 64-72, 87-92, 107-118, 129-130, 147-151, 165-177, 187-188, 205-208, 223-224, 236, 238-240, 255-268, 276, 279-280, 297-300, 303-304, 306-307, 309-310, 312-313, 315-319 were rejected under 35 USC 102. Claims 6, 42, 73, 93, 127, 152, 185, 209, 233, 241, 277, 301, 305, 308, 311, and 314 were rejected under 35 USC 103. Based on the aforementioned amendments and the arguments presented herein, Applicants respectfully request reconsideration, removal of the rejections, and that the claims be placed in condition for allowance.

35 USC 102

The Office Action rejected Claims 1, 62, 88, 147, 205, and 236 under 35 US 102 as anticipated by Bowman-Amuah (ES Patent No. 6,289,382), hereinafter Bowman. Applicants

have amended Claims 1, 62, 88, 147, 205, and 236 to more clearly claim Applicants' invention. As the Office Action rejected these claims together, Applicants will respond in kind in one argument. Applicants assert that Bowman may not be used as a proper 35 USC 102 rejection as it does not disclose each and every element of the claimed invention.

Bowman, in general, states he discloses:

> A system, method, and article of manufacture are provided for delivering service via a globally addressable interface. A plurality of interfaces are provided with access allowed to a plurality of different sets of services from each of the interfaces. Each interface has a unique set of services associated therewith. Each of the interfaces is named with a name indicative of the unique set of services associated therewith. The names of the interfaces are then broadcast to a plurality of systems requiring service.

As well, Bowman describes "Object oriented programming" and its "process of developing computer software using objects, including the steps of analyzing the problem, designing the system, and constructing the program." However, Applicants would respectfully assert that Bowman does not disclose "processing a function in a realm independent of said other realms, and based on said processing propagating a behavior of one of the unified objects of one realm to said unified object of another realm using at least one association between the one realm and the another realm," as is claimed.

With respect to this portion of the claim, the Office Action cited Figures 31-47 and the description, Col. 115 lines 27-48, Col. 124 lines 5-21, Col. 126 lines 2-66, Col. 128 lines 6-29 Col. 153, lines 29-37, Col. 283 lines 13-39, Col. 304 lines 10-25. As well, in the answer to Applicants remarks, the Office Action also re-cited the aforementioned portion of Bowman then

specifically cited Col. 304 lines 10-25 and additionally cited Col. 283 lines 6-40. Applicants will first address the specifically cited portion of Bowman then, in turn, the rest of the cited portions.

First, with respect to "associations" in Bowman at Col. 304 lines 10-25, the Office Action cited that a "parent object that propagates its context to a child." Here, Bowman seems to be stating that a parent can pass its context e.g. "which LUW owns it" to a child object. However, Applicants have not claimed passing "context" from one object to another. Rather, Applicants have claimed "processing a function in a realm . . . based on said processing propagating a behavior of one of the unified objects of one realm to said unified object of another realm." Further, Applicants would respectfully assert that the parent and child are, within Bowman, in the same context or model and therefore not in "another realm . . . using at least one association between the one realm and the another realm."

With respect to Bowman Col. 283 lines 6-40, here Bowman states that "most useful business objects have a relationship, or association, with other business objects" and "this relationship is expressed as a pointer or reference to the object. However, pointers (and references) are memory constructs valid only so long as the object state exists in memory." At this section, Bowman refers to the relationships between business objects and the problems with using that relationship if linked by a pointer (to memory) and that other object no longer exists. However, Applicants assert this is not the same as "processing a function in a realm . . . based on said processing propagating a behavior of one of the unified objects of one realm to said unified object . . . using at least one association between the one realm and the another realm." Applicants would assert that Bowman is dealing with a problem of Object Oriented Objects linking to each other using pointer which no longer point to the Object Oriented Object.

Additionally, Applicants would respectfully assert that these objects are not in "another realm," as claimed.

Applicants have reviewed Figures 31-47 and would respectfully assert that these Figures do not disclose "processing a function in a realm independent of said other realms, and based on said processing propagating a behavior of one of the unified objects of one realm to said unified object of another realm using at least one association between the one realm and the another realm." Based on the number of figures and reference in the Office Action to the "description," Applicants are further unsure as to which figure is asserted to correspond to which claimed element. Since Applicants have carefully reviewed the cited figures, Applicants again respectfully assert that the figures do not correspond to the claimed elements of "processing a function in a realm independent of said other realms, and based on said processing propagating a behavior of one of the unified objects of one realm to said unified object of another realm using at least one association between the one realm and the another realm."

At Column 115, lines 27-48, Bowman refers to "[w]orkflow services control and coordinate the tasks that must be completed in order to process a business event. . . . Workflow enables tasks within a business process to be passed among the appropriate participants, in the correct sequence, and facilitates their completion within set times and budgets . . . It uses business process rules, routing information, role definitions and queues." However, Applicants would respectfully assert that "workflow" does not disclose "processing a function in a realm independent of said other realms, and based on said processing propagating a behavior of one of the unified objects of one realm to said unified object of another realm using at least one association between the one realm and the another realm."

In the example that Bowman gives, "workflow" seems to direct collection and routing of an "essay and your personnel file" to "numerous individuals who must review the material and approve your promotion." First, Applicants would respectfully assert that this is not "between the one realm and the another realm." As well, Applicants would assert it is not "propagating a behavior of one of the unified objects of one realm to said unified object of another realm." Rather, what Bowman's workflow seems to route an object through different other objects.

At column 124, lines 5-21, Bowman discusses "Management Considerations:"

> The Management Considerations section discusses the key benefits, risks, and issues introduced by a component engagement. Key topics include: Managing risk in balancing tradeoffs between strategy, people, process, and technology. Considering issues related to configuration management, testing, and performance of object systems Addressing the component development learning curve Differences between development architecture considerations leveraging the advantages of a component industry. The Management Considerations section also address issues not unique to Component technology, including: Estimating, planning, and managing iteration. Organizing and managing to achieve reuse of both architecture and business logic

Applicants have carefully considered this cited portion of Bowman and would respectfully assert that this does not disclose "processing a function in a realm independent of said other realms, and based on said processing propagating a behavior of one of the unified objects of one realm to said unified object of another realm using at least one association between the one realm and the another realm."

Bowman, at Col. 126 lines 2-66, discuses "Business Components [which] model real-world concepts in the business domain" and "Partitioned Business Components [which] implement those concepts in a particular environment." Bowman states "Business Components provide an underlying logical framework for ensuring flexibility, adaptability, maintainability,

and reusability . . . serve to break down large, complex problems into smaller, coherent elements . . . model the business in terms of the real-world concepts that make up the domain." Conversely, Bowman states "Partitioned Business Components and Engineering Components provide a means for implementing, packaging, and deploying the application." However, Applicants would respectfully assert that this discussion on "Business Components models" and later "Partitioned Business Components" does not disclose "processing a function in a realm independent of said other realms, and based on said processing propagating a behavior of one of the unified objects of one realm to said unified object of another realm using at least one association between the one realm and the another realm."

At Col. 128 lines 6-29, Bowman discuses "Business Components." Here Bowman states that Business Components "encapsulate information." For example, Bowman states that a "Customer Business Component would encapsulate everything an organization needs to know about its customers" and that a "Pricing Business Component would encapsulate every-thing an organization needs to know about how to calculate the price of a product." However, Applicants would respectfully assert that this does not disclose "processing a function in a realm independent of said other realms, and based on said processing propagating a behavior of one of the unified objects of one realm to said unified object of another realm using at least one association between the one realm and the another realm." Specifically, Applicants would assert that as Bowman states everything is encapsulated in a "Business Component" that Bowman would have no need to "based on said processing propagating a behavior of one of the unified objects of one realm to said unified object of another realm."

At, Col. 153 lines 29-37, Bowman discusses the skill set needed by a developer to create a model:

> Component Development Requires Functional, Technical, and Modeling Competencies
>
> A component-based project adds a third dimension— modeling. The skill set to model and represent behaviors and relationships in components and objects is a distinct, complimentary skill set to functional and technical skills. Thus, most projects find that they need a third type of expert—e.g., a component/object modeling architect(s), to provide direction.

Applicants have carefully considered this portion of Bowman and most respectively assert that this does not disclose "processing a function in a realm independent of said other realms, and based on said processing propagating a behavior of one of the unified objects of one realm to said unified object of another realm using at least one association between the one realm and the another realm."

Therefore, Applicants would respectfully assert that Bowman does not disclose "processing a function in a realm independent of said other realms, and based on said processing propagating a behavior of one of the unified objects of one realm to said unified object of another realm using at least one association between the one realm and the another realm." Not disclosing each and every element of Claims 1, 62, 88, 147, 205, and 236, Applicants assert Bowman may not be used as a proper 35 USC 102 rejection. Therefore Applicants respectfully request that the rejection of Claims 1, 62, 88, 147, 205, and 236 be withdrawn and these claims be placed in condition for allowance. As Claims 2-6, 20-33, 42, 44, 45, 64-72, 73, 88-93, 107-118, 127, 129-130, 148-151, 152, 167-177, 285, 187, 188, 206, 223, 224, 233, 238-241, 255-268, 276, 277, 279, 280, 297-301, and 303-319 depend on Claims 1, 62, 88, 147, 205, and 236 and Applicants believe that Claims 1, 62, 88, 147, 205, and 236 are allowable, Applicants believe

that the dependant claims should allowable for at least the same reasons. Therefore, Applicants respectfully request withdrawal of the rejections of the dependant claims and that the dependant claims also be placed in condition for allowance.

35 USC 103 rejection Claims 6, 73, 93, 152, 209, and 241

The Office Action rejected Claims 6, 73, 93, 152, 209, and 241 under 35 USC 103 as anticipated by Bowman in light of Semeria (Multiprotocol Label Switching: Enhancing Routing in the New Public Network), hereinafter Semeria. Applicants respectfully assert that Bowman and Semeria can not be used as a proper 35 USC 103 rejection for Claims 6, 73, 93, 152, 209, and 241 as they do not satisfy the KSR test as promulgated by the Supreme Court.

In *Teleflex v. KSR,* the Supreme Court stated that a proper 35 USC 103 rejection requires the following steps be performed: (1) Determining the scope and content of the prior art; (2) Ascertaining the differences between the claimed invention and the prior art; and (3) Resolving the level of ordinary skill in the pertinent art. *Teleflex Inc. v. KSR Int'l Co.* 127 S.Ct. 1727, 1741, 82 USPQ.2d 1385, 1396 (2007). This three part test has also been reemphasized and promulgated in the Federal Register. *Federal Register*, Vol. 72, No. 195.

With respect to KSR Applicants first address the scope of Bowman. Bowman states he provides:

> A system, method, and article of manufacture are provided for delivering service via a globally addressable interface. A plurality of interfaces are provided with access allowed to a plurality of different sets of services from each of the interfaces. Each interface has a unique set of services associated therewith. Each of the interfaces is named with a name indicative of the unique set of services associated therewith. The names of the interfaces are then broadcast to a plurality of systems requiring service.

As well, Bowman describes "Object oriented programming" and its "process of developing computer software using objects, including the steps of analyzing the problem, designing the system, and constructing the program."

With respect to the second prong of KSR and Bowman, Applicants would respectfully assert that Bowman does not disclose "processing a function in a realm independent of said other realms, and based on said processing propagating a behavior of one of the unified objects of one realm to said unified object of another realm using at least one association between the one realm and the another realm," as is claimed. To support this assertion, Applicants incorporate the arguments made as to why Bowman may not support a proper 35 USC 102 rejections.

With respect to the first prong of KSR, Applicants now address the scope of Semeria. Semeria states the first half of his paper describes "the forces that motivated the development and evolution of these different solutions [MPLS]." He states the second half of his paper describes "the goals and objective of the MPLS working group, the core MPLS components …"

With respect to the second prong of KSR and Semeria, Applicants respectfully assert that Semeria does not cure the deficiencies of Bowman. Specifically, Applicants assert Semeria does not disclose "processing a function in a realm independent of said other realms, and based on said processing propagating a behavior of one of the unified objects of one realm to said unified object of another realm using at least one association between the one realm and the another realm."

Applicants therefore assert that the cited references, in isolation or in combination, do not teach the claimed invention. Applicants further assert that one skilled in the relevant computer arts would not bridge the gap to arrive at the current invention. Therefore, Applicants

respectfully assert that these references, in combination or in isolation, fail to satisfy the 35 USC 103 test as promulgated by the Supreme Court in KSR. As a result, Applicants assert that this 35 USC 103 rejection is improper and respectfully request it be removed and Claims 6, 73, 93, 152, 209, and 241 be place in condition for allowance.

35 USC 103 rejection Claims 42, 127, 185, 233, 277, 301, 305, 308, 311, and 314

The Office Action rejected Claims 42, 127, 185, 233, 277, 301, 305, 308, 311, and 314 under 35 USC 103 as anticipated by Bowman in light of McGee (US Patent No. 6,289,382), hereinafter McGee. Applicants respectfully assert that Bowman and McGeecan not be used as a proper 35 USC 103 rejection for Claims 6, 73, 93, 152, 209, and 241 as they do not satisfy the KSR test as promulgated by the Supreme Court.

In *Teleflex v. KSR,* the Supreme Court stated that a proper 35 USC 103 rejection requires the following steps be performed: (1) Determining the scope and content of the prior art; (2) Ascertaining the differences between the claimed invention and the prior art; and (3) Resolving the level of ordinary skill in the pertinent art. *Teleflex Inc. v. KSR Int'l Co.* 127 S.Ct. 1727, 1741, 82 USPQ.2d 1385, 1396 (2007). This three part test has also been reemphasized and promulgated in the Federal Register. *Federal Register*, Vol. 72, No. 195.

With respect to KSR Applicants first address the scope of Bowman. Bowman states he provides:

> A system, method, and article of manufacture are provided for delivering service via a globally addressable interface. A plurality of interfaces are provided with access allowed to a plurality of different sets of services from each of the interfaces. Each interface has a unique set of services associated therewith. Each of the interfaces is named with a name indicative of the unique set of services associated therewith. The names of the interfaces are then broadcast to a plurality of systems requiring service.

As well, Bowman describes "Object oriented programming" and its "process of developing computer software using objects, including the steps of analyzing the problem, designing the system, and constructing the program."

With respect to the second prong of KSR and Bowman, Applicants would respectfully assert that Bowman does not disclose "processing a function in a realm independent of said other realms, and based on said processing propagating a behavior of one of the unified objects of one realm to said unified object of another realm using at least one association between the one realm and the another realm," as is claimed. To support this assertion, Applicants incorporate the arguments made as to why Bowman may not support a proper 35 USC 102 rejections.

With respect to the first prong of KSR and McGee, Applicants now address the scope of McGee. McGee states he provides a "system and method for dynamically generating alarm thresholds for performance metrics, and for applying those thresholds to generate alarms." McGee also states "[s]tatistical methods are used to generate one or more thresholds for metrics that may not fit a Gaussian or normal distribution, or that may exhibit cyclic behavior or persistent shifts in the values of the metric."

With respect to the second prong of KSR and McGee, Applicants respectfully assert that McGee does not cure the deficiencies of Bowman. Specifically, Applicants assert McGee does not disclose "processing a function in a realm independent of said other realms, and based on said processing propagating a behavior of one of the unified objects of one realm to said unified object of another realm using at least one association between the one realm and the another realm."

Applicants therefore assert that the cited references, in isolation or in combination, do not teach the claimed invention. Applicants further assert that one skilled in the relevant computer arts would not bridge the gap to arrive at the current invention. Therefore, Applicants respectfully assert that these references, in combination or in isolation, fail to satisfy the 35 USC 103 test as promulgated by the Supreme Court in KSR. As a result, Applicants assert that this 35 USC 103 rejection is improper and respectfully request it be removed and Claims 42, 127, 185, 233, 277, 301, 305, 308, 311, and 314 be place in condition for allowance.

Conclusion

In view of the foregoing, the Applicants believe that the application is in condition for allowance and respectfully request favorable reconsideration.

In the event the Examiner deems personal contact desirable in the disposition of this case, the Examiner is invited to call the undersigned attorney at (508) 293-7450.

Please charge all fees occasioned by this submission to Deposit Account No. 05-0889.

Respectfully submitted,

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